From: Darin Watkins < DWatkins@spokanerealtor.com>

Sent: Friday, October 14, 2022 11:18 AM

To: DES SBCC

Subject: Residential Natural Gas Ban

External Email

As a sitting member of the residential TAG Group for the SBCC – I have raised the issue repeatedly about the need to complete a cost benefit analysis or a small business impact study on these code proposals, as required in the RCW's.

Specific to Spokane, there are a number of critical issues to consider:

- The electrical grid can't support a full ban on natural gas. Avista believes it would need to double its capacity to absorb a gas ban.
- In Spokane, any new electrical power generation will need to come from Natural Gas which burns only 45-55% efficient, as compared with new home furnaces that are 95% efficient
- Avista believes we can save far more greenhouse gas emissions through weatherization and upgrading furnaces that we can eliminating new gas hook ups.
- There is no coherent plan to replace the natural gas energy that total electrification will require

 leading to more blackouts and price hikes to businesses and ratepayers.
- In Spokane, the planned conversion to heat pumps is a laudable goal yet heat pumps do NOT work well in our climate (under 30-degrees, or over 90-degrees)
- We are facing the worst housing crisis in Washington State's history. We currently rank 50th in the nation for the number of housing units per capita. Spokane is also among the worst cities in the nation for housing some 25,000 housing units short for the City alone. We must do everything we can to add to the affordability of homes, now without compromising efficiency, which is already among the highest building code standards in the US
- We can save far more greenhouse gas emissions in Spokane, by building more homes where people work and go to school instead of pushing buyers into Idaho where there is far more availability. Instead, we are seeing daily car traffic nearly double every few years.
- There are no exemptions for those working to produce low income housing. It makes no sense to add \$5,000 solar ready electrical panels and garage plug in stations for electric cars for those who are barely able to afford rent

Should this proposal STILL go forward, I ask that you consider exemptions for those working to provide low-income housing, and for border counties faced with enormous greenhouse gas emissions from commuters finding available housing in state's with far less building restrictions.

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